

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

BARBARA LODER HILDEBRANDT,

Plaintiff,

vs.

HYATT CORPORATION, et al.

Defendants.

Case No. C-1-02-0003

Judge Beckwith
Magistrate Judge Sherman

AFFIDAVIT OF JOHN HORNE

STATE OF ILLINOIS }
 } ss:
COUNTY OF LAKE }

BEFORE ME, the undersigned authority, personally appeared, JOHN HORNE, who, after first being duly sworn, deposes and states that he is an adult person, over 18 years of age, competent to testify as to the following matters as to which he has personal knowledge or which he believes to be true:

1. I have been employed with Hyatt since 1989. I am currently the Assistant Vice President of National Sales and have held this position since October 1999.

2. In this position, my duties include managing the National Sales Force, increasing sales for the Company, and ensuring Hyatt provides service to the National Accounts within the Company.

3. As Assistant Vice President of National Sales, I am responsible for the employment of the sales personnel in the National Sales Force. As such, I am familiar with



the employment and the accounts of the sales personnel in the National Sales Force, including the employment of Barbara Loder Hildebrandt.

4. In my position, I was directly involved in making the decisions with regard to the reduction in force that affected the National Sales Force in or about September and October 2001.

5. I am familiar with the accounts of the sales personnel in the National Sales Force, both before and after the reduction in force.

6. Following the reduction in force, the accounts of the individuals affected were reassigned to various individuals.

7. The decisions regarding account reassignment were in no way based on the age or gender of any individual, and instead were based on reasons related to the business feasibility of reassigning the accounts to various individuals.

8. For example, in the case of Dean D'Anna, approximately 1 of his accounts was assigned to a 32 year old woman, 1 to a 43 year old woman, 4 to a 47 year old man, 6 to a 42 year old man, and 3 were assigned back "to the field."

9. In the case of Mary Rocereto, approximately 1 of her accounts was assigned to a 43 year old woman, 13 to a 56 year old woman, 3 to a 32 year old woman, one to a 24 year old woman, and 3 to a 44 year old man.

10. In the case of Mary Patton, who was 37 at the time of the reduction in force, approximately 4 of her accounts were assigned to a 41 year old woman, 6 to a 41 year old woman, 3 to a 52 year old man, 12 to a 49 year old woman, and one to a 42 year old woman.

11. To date, no one has been hired to fill the position of Barbara Loder Hildebrandt.

FURTHER AFFIANT SAYETH NAUGHT.

John Horne
JOHN HORNE

SWORN TO and SUBSCRIBED before me this 27 day of February 2003
by JOHN HORNE, Assistant Vice President of Sales for HYATT _____,
who is personally known to me or has produced _____ as
identification.

Verena C. Castellanos
NOTARY PUBLIC, STATE OF ILLINOIS
OFFICIAL SEAL
Verena C. Castellanos
Notary Public, State of Indiana
My Commission Expires 3/4/08
Indiana